COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Piedmont Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Georgia-Pacific Corporation
Jarratt Softboard Sheathing Plant
Jarratt, Virginia
Permit No. PRO50253

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Georgia-Pacific Corporation has applied for a Title V Operating Permit for its Jarratt, VA facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____ Date:_____

Air Permit Manager: _____ Date:_____

Regional Deputy Director: _____ Date:_____

FACILITY INFORMATION

Permittee/Facility
Georgia-Pacific Corporation - Jarratt
P.O. Box 367
Jarratt, VA 23867

AIRS ID No. 51-081-0002

SOURCE DESCRIPTION

SIC Code: 2493

The facility is a softboard sheathing manufacturing facility which is operated by Georgia-Pacific Corporation.

The facility is a Title V major source. This source is located in an attainment area for all pollutants, and is also a PSD major source, due to permitted emissions from its coal-fired Keeler boiler and dryers.

COMPLIANCE STATUS

The facility was originally constructed in 1938. The 101.7 MMBtu/hr boiler was first permitted on October 26, 1978 followed by issuance of a PSD permit to install and operate the boiler on April 2, 1984. The permit was modified on February 18, 1994 followed by an amendment issued on July 18, 1996, which down-rated the boiler to 86.6 MMBtu/hr. Amendments issued October 4, 2001 and October 30, 2001 removed the provisions to burn paper pellets in the boiler, and as a result raised the hourly SO_2 limits. GP entered into a consent order with the DEQ, signed September 28, 1998, to allow visible emissions to exceed not greater than 50% opacity from softboard drier zone stacks one and two, except for one six-minute period in any one hour of not more than 60% opacity and during periods of start-up, shut down, and malfunction. Additionally, a permit to construct and operate a spray booth was issued July 22, 1994, and a permit for a hot roll coating operation was issued on August 14, 2003 and amended on February 10, 2004. The last inspection was performed on May 18, 2004 and the facility was deemed to be in compliance.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following :

Emission Unit ID (EU ID)	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Stack ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
3	Keeler Boiler No. 3 1978	86.61 MMBtu/hr heat input	Zurn Type multiclone MTSA-56-96YT		EP-15	TSP/PM-10	November 26, 2003
Process Equipment							
F-B-16 F-B-17	Coal Handling 1978	110 tons/hr			Fugitive	No Control	None
E-CP-2	NW silo cyclone 1972	60 tons/hr			CP-20	No Control	None
E-CP-3	NE silo cyclone 1972	60 tons/hr			CP-21	No Control	None
E-CP-4	SW silo cyclone 1972	60 tons/hr			CP-22	No Control	None
E-CP-5	#5 refiner cyclone 1972	60 tons/hr			CP-25	No Control	None
E-CP-6	#1-4 refiners cyclone 1972	60 tons/hr			CP-33	No Control	None
F-CP-1	Chip unloading hopper and conveyor 1972	120 tons/hr			CP-2	No Control	None
F-CP-2	Vibrating screen 1972	120 tons/hr			CP-4	No Control	None

Emission Unit ID (EU ID)	**Emission Unit Description**	**Size/Rated Capacity**	**Pollution Control Device (PCD) Description**	**PCD ID**	Stack ID	Pollutant Controlled	Applicable Permit Date
F-CP-3A	Accepts conveyor 1972	120 tons/hr			CP-7	No Control	None
F-CP-3B	Transfer Conveyor 1972	120 tons/hr			CP-8	No Control	None
F-CP-4	Pile/feeder blower 1972	120 tons/hr			CP-9	No Control	None
E-PP-11	Dryer (Zone 1) 1987	12.9 tons/hr (37 mbf/hr) (3792 cfm/36" dia)			Dryer (Zone 1)	No Control	04/28/00
E-PP-12	Dryer (Zone 2) 1987	12.9 tons/hr (37 mbf/hr) (3792 cfm/36" dia)			Dryer (Zone 2)	No Control	04/28/00
E-PP-13	Dryer (Zone 3) 1987	12.9 tons/hr (37 mbf/hr) (3792 cfm/36" dia)			Dryer (Zone 3)	No Control	None
E-TS-1	Trim Saws 2000		Ducon Dust Collector	E-PL-39	EP-14	TSP/PM-10	None
E-PP-7	Vent, No. 5 refiner dump chest 1972	6 tons/hr			PP-7	No Control	None
E-PP-8	Vent, main refiner dump chest 1972	24 tons/hr			PP-5	No Control	None
E-PB-1	Paint Spray Booth 1995	3.8 gallons/min			EP-16	TSP/PM-10	07/22/94
F-HR-1	Hot Roll Coating Operation 2003	8400 square feet/hr				No Control	02/10/04

EMISSIONS INVENTORY-Emissions for year 2001 are summarized in the following tables.

Emission Unit	2001 Actual Criteria Pollutant Emission in Tons/Year				
	VOC	**CO**	**SO_2**	**PM_{10}**	**NO_x**
3 (Keeler boiler)	0.5	5.4	316.3	65.9	142.1
F-B-16 & -17 (Coal Handling)	--	--	--	9.2	--
E-PP-2 (NW silo cyc)	--	--	--	4.7	--
E-PP-3 (NE silo cyc)	--	--	--	4.7	--
E-PP-4 (SW silo cyc)	--	---	--	4.7	--
E-PP-5 (#5 refiner cyc)	--	--	--	1.2	--
E-PP-6 (#1-4 refiners cyclone)	--	--	--	13.2	--
F-CP-1 (Chip unloading hopper and conveyor)	--	--	--	2.4	--
F-CP-2 (Vib. screen)	--	--	--	1.6	--
F-CP-3A (Accepts conveyor)	--	--	--	2.4	--
F-CP-3B (Transfer conveyors)	--	--	--	0.8	--
F-CP-4 (Pile feeder/blower)	--	--	--	10.8	--
E-PP-11 (Zone 1 dryer)	9.2	--	--	2.8	--
E-PP-12 (Zone 2 dryer)	2.6	--	--	4.2	--
E-PP-13 (Zone 3 dryer)	--	--	--	--	--
E-PL-39 (Trim Saw Wet Scrubber)	21.6	--	--	9.2	--
E-PP-7 (Vent, No. 5 refiner dump chest)	75.3	--	--	0.3	--
E-PP-8 (Vent, main refiner dump chest)	301.0	--	--	66.0	--
EP16 (Spray booth)	0	--	--	0.1	--
Total	410.3	5.4	316.3	134.4	142.1

Pollutant	Actual Hazardous Air Pollutant Emissions in 2001 in Tons/Year
Acetaldehyde	0.52
Acrolein	0.09
Copper	0.14
Cumene	0.41
Formaldehyde	2.13
HCl	14.9
HF	2.77
Lead	0.1
Methyl Ethyl Ketone	0.45
Mercury	0.44
Methanol	4.34
Naphthalene	0.18
POM	28.5
Selenium	0.12
Zinc	0.29

EMISSION UNIT APPLICABLE REQUIREMENTS – Fuel Burning Equipment

Limitations

The No. 3 Keeler boiler was originally permitted under a PSD permit dated 4/2/84. At that time, the boiler was rated at 101.7 MMBtu/hr, coal was the approved fuel with a 1.0% coal sulfur limit, and the hourly SO_2 limit on the boiler was 157.1 lbs/hr.

The 1994 amendment derated the boiler to 86.61 MMBtu/hr, and added paper pellets as an approved fuel. A 1.04 lb/MMBtu limit for SO_2 was added for the coal/paper pellet mixture, as well as an annual SO_2 limit of 398 tons/yr. Criteria pollutant, lead, and HCl emission limits were also added in the amended permit for the boiler. The permit was amended again in 1996, without affecting the emission limits.

Georgia-Pacific discontinued the burning of paper pellets in the boiler, but in order to meet the lb SO_2/MMBtu and hourly SO_2 limits without the paper pellets, the coal sulfur content had to be lowered to such a degree that GP had difficulty locating a supplier who could deliver coal which would meet the emission limits. A permit amendment was requested in 2001 to remove paper pellets from the list of approved fuels, and to eliminate the 1.04 lb SO_2/MMBtu emission limit. This amendment was issued on October 4, 2001. Subsequently, the permit was amended (dated October 30, 2001) to increase the hourly SO_2 limit as well (from 90.8 lbs/hr to 128.2 lbs/hr), since the earlier permit limit had been calculated assuming a mix of coal and paper pellets, and could not be met while burning 1.0% sulfur coal alone. A permit amendment raising the annual SO_2 limit to 561.5 tons/yr (to correspond with the hourly limit x 8760 hours/year) was issued on September 6, 2002. It was determined that this was not a PSD modification, because the 1994 permit did not provide emission limits for the boiler when burning coal alone.

Another amendment, issued November 26, 2003, corrected the other criteria pollutant limits to correspond with emissions resulting from the combustion of coal alone. The new limits were based on stack testing conducted prior to the 1994 permit.

The boiler was installed prior to the affected facility date of NSPS Subpart Dc, and therefore does not have Dc as an applicable requirement. The boiler is subject to the opacity standard of 20% for new sources, although the allowance for a 6-minute period of 30% opacity in any hour has been eliminated from the new source permit..

The following limitations for the Keeler boiler No. 3 (EU ID #03) are taken from the November 26, 2003 permit, which superseded all previous permits for the boiler:

1. Particulate emissions from the No. 3 Keeler boiler shall be controlled by two (2) multicyclones in series. The multicyclones shall be provided with adequate access for inspection. An annual inspection shall be conducted on the multicyclones to ensure structural integrity.
   (9 VAC 5-80-110 and Condition 3 of 11/26/03 Permit)

2. The approved fuel for the boiler is coal. A change in the fuel may require a permit to modify and operate.
   (9 VAC 5-80-110 and Condition 4 of 11/26/03 Permit)

3. During boiler startup, the permittee may use oil, oily rags, used oil absorbents, and wood scraps generated at the Georgia-Pacific Jarratt Softboard Plant as an acceptable alternative to the manufacturer's recommended materials for providing the initial fire to the boiler prior to combustion of coal.
   (9 VAC 5-170-160)

4. The sulfur and ash contents of the coal consumed by the No. 3 boiler shall not exceed 1.0 percent and 8.8 percent by weight, respectively, per shipment. The permittee shall maintain records (supplier fuel analysis) of all coal shipments purchased. These records shall be current for the most recent five years.
(9 VAC 5-80-110, and Condition 5 of 11/26/03 Permit)

5. The No. 3 boiler shall consume no more than 27,811 tons per year of coal, calculated as the sum of each consecutive twelve (12) month period.
(VAC 5-50-260, and Condition 6 of 11/26/03 Permit)

6. The steam flow and operating steam pressure of the No. 3 boiler shall not exceed 85,000 pounds per hour and 340 psig, respectively. The steam flow, steam pressure, and feedwater temperature shall be continuously monitored and recorded to indicate hourly compliance with the boiler maximum rated capacity of 86.61 million Btu/hr. These operating limits shall apply at all times except during startup, shutdown and malfunction.

Added in response to permittee comment submitted during public notice period:

Whenever the boiler is in operation, the monitoring system shall be monitoring except during periods of monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, and the monitoring system shall be capable of completing at least one cycle of operation (i.e., measuring and recording) every 15 minutes.

(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 7 of 11/26/03 Permit)

7. Emissions from the operation of the No. 3 boiler shall not exceed the limits specified below:

Particulate Matter	20.0 lbs/hr	88.0 tons/yr	(9 VAC 5-50-260)
PM-10	14.7 lbs/hr	64.0 tons/yr	(9 VAC 5-50-260)
Sulfur Dioxide	128.2 lbs/hr	561.5 tons/yr	(9 VAC 5-50-260)
Nitrogen Oxides (as NO_2)	51.0 lbs/hr	223.8 tons/yr	(9 VAC 5-50-260)
Carbon Monoxide	3.1 lbs/hr	13.5 tons/yr	(9 VAC 5-50-260)
Volatile Organic Compounds	0.6 lbs/hr	2.7 tons/yr	(9 VAC 5-50-260)
Hydrogen Chloride	5.38 lbs/hr	23.6 tons/yr	(9 VAC 5-50-180)
Lead	0.04 lbs/hr	0.18 tons/yr	(9 VAC 5-50-180)

(9 VAC 5-80-110, and Condition 8 of 11/26/03 Permit)

8. Visible emissions from each of the No. 3 boiler exhaust shall not exceed 20 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-50-80, 9 VAC 5-50-260, and Condition 9 of 11/26/03 permit)

9. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:

a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

b. Maintain an inventory of spare parts.

c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.

d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training, and the nature of training.

Records of maintenance and training shall be maintained on the site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 5-50-20 E and Condition 16 of 11/26/03 Permit)

Periodic Monitoring

The following chart delineates the periodic monitoring requirements for the No. 3 Keeler boiler:

Periodic Monitoring Requirements for No. 3 Keeler				
Limitations	**Parameter**	**Monitoring**	**Record Keeping**	**Reporting**
Particulate emissions controlled by two (2) multicyclones in series	Control equipment operation, differential pressure across multi cyclones	Annual inspection of cyclones to ensure structural integrity; Establishment of baseline differential pressure across multicyclones, inspection if actual differential pressure falls below 80% of baseline	Differential pressure readings across multicyclones, results of multiclone inspections	
Fuel allowed is coal; sulfur and ash content not to exceed 1.0 and 8.8 percent by weight, respectively.	Boiler construction and design.	none needed	Fuel Throughput Records, coal shipments purchased, including sulfur & ash content, and heating value, per shipment	none needed
Hourly and annual emissions limitations for the boilers.	Boiler rating; Fuel characteristics; Emission factors from AP-42; Formulas	Facility must keep on hand formulas, boiler ratings, fuel characteristics, emission factors from AP-42, and formulas to show that the boiler cannot exceed these limits. SEE LIMITATIONS DEMONSTRATION BELOW.		
Control of boiler emissions through proper operation and maintenance.	Good written operating procedures; Maintenance schedule;	n/a	Maintain maintenance schedule on site. Records of maintenance and repair; Copy of operating procedures on site.	N/a
Boiler maximum rated capacity of 86.61 MMBtu/hr	Steam flow and steam operating pressure to be maintained at or below 85,000 lb/hr and 340 psig, respectively	Steam flow, pressure, and feedwater temperature shall be continuously monitored to show hourly compliance (1-hr avg. with measurements taken not more than 15 minutes apart)	Records of steam flow, operating steam pressure, and feedwater temperature to verify compliance with 86.61 MMBtu/hr boiler rating	N/a

Periodic Monitoring Requirements for No. 3 Keeler				
Limitations	**Parameter**	**Monitoring**	**Record Keeping**	**Reporting**
9 VAC 5-50-80 opacity standards	Visible emissions and opacity	Weekly visual inspection with Method 9 follow-up observation of apparent abnormal opacity condition.	Results of visual observations, cause of any abnormal and excess visible emissions, corrective action	Report results of any Method 9 observation, and cause and duration of excess emissions, as well as corrective action taken.

Conditions will be added to the TV permit to reflect the above chart. Monitoring conditions to be added for TV periodic monitoring demonstrations (9 VAC 5-80-110 B) are as follows:

- Weekly visual observation of the boiler stack, with Method 9 follow-up when apparent abnormal condition is noted.

Recordkeeping

The following record keeping requirements are for the purposes of periodic monitoring (9 VAC 5-80-110):

- Required to keep fuel quality and usage records (tons of coal throughput, sulfur and ash content)
- Records of boiler ratings, fuel characteristics and formulas to provide compliance with emission limits.
- Maintain a copy of the operating procedures on site.

Testing

The permit does not require source tests for the boilers. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

The following condition is from the Commonwealth of Virginia's *Regulations for the Control and Abatement of Air Pollution:*

- The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
  (9 VAC 5-50-30, 9 VAC 5-80-110)

- If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Methods 18, 25, 25a
NOx	EPA Method 7
SO2	EPA Method 6
CO	EPA Method 10
PM/PM10	EPA Method 5
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

Reporting

To support the periodic monitoring requirements (9 VAC 5-80-110 B) of the TV permit, the following conditions regarding reporting will be placed in the TV permit.

- Report annual fuel throughput (coal) and emissions (calendar year)

- Report the results of any Method 9 visible emissions evaluations

Streamlined Requirements

Boiler permit is current and requirements have been updated.

Inapplicable Requirements

As originally constructed, this boiler would have been subject to the requirements of NSPS Subpart Db (>100 MMBtu/hr), but construction preceded the effective date of June 19, 1984.

EMISSION UNIT APPLICABLE REQUIREMENTS – (Chip Process, including cyclones, emission unit ID #E-CP-2 through E-CP-6, F-CP-1 and F-CP-4)

Limitations

The chip process consists of existing equipment that does not have any permit-related applicable requirements. The only requirements placed upon the process by the Title V permit are the existing source visible emissions limits, and the grain loading requirements of Rule 4-17: Emission Standards for Woodworking Operations

1. Visible emissions from the Chip Process, including cyclones (EU ID#E-CP-2 through E-CP-6, F-CP-1 and F-CP-4) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity. (9 VAC 5-40-80 and 9 VAC 5-80-110)

2. Emissions from the operation of the Chip Process, including cyclones (EU ID #E-CP-2 through E-CP-6, F-CP-1 and F-CP-4) shall not exceed the limits specified below:

Total Suspended Particulate	.05 gr/dscf	(9 VAC 5-40-2270)
PM-10	.05 gr/dscf	(9 VAC 5-40-2270)

   (9 VAC 5-40-2270 and 5-80-110)

Periodic Monitoring

Monitoring to be added for TV periodic monitoring demonstration (9 VAC 5-80-110 B) as follows:

- Weekly visual observation of the Chip Process (EU ID #E-CP-2 through E-CP-6, F-CP-1 and F-CP-4), with Method 9 follow-up when apparent abnormal condition is noted.

Recordkeeping

The following record keeping requirements are for the purposes of periodic monitoring (9 VAC 5-80-110):

- Required to keep records of throughput
- Required to keep records of any visible emissions evaluations

Testing

The permit does not require source tests for the chip process. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

The following condition is from the Commonwealth of Virginia's *Regulations for the Control and Abatement of Air Pollution:*

- The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
  (9 VAC 5-50-30, 9 VAC 5-80-110)

- If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM/PM10	EPA Method 5
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

Reporting

To support the periodic monitoring requirements (9 VAC 5-80-110 B) of the TV permit, the following conditions regarding reporting will be placed in the TV permit.

- Report throughput and emissions (calendar year)

- Report the results of any Method 9 visible emissions evaluations

STREAMLINED REQUIREMENTS

The process weight rule (Rule 4-4: Emission Standards for General Process Operations) could be applicable to the chip process, but would allow excessive emissions. The .05 gr/scf standard contained in the woodworking rule (Rule 4-17) is more stringent.

EMISSION UNIT APPLICABLE REQUIREMENTS – (Dryer (Zones 1, 2, and 3), EU ID #E-PL-11 through E-PL-13)

Limitations

The Dryer (Zones 1-3) consists of existing equipment that does not have any permit-related applicable requirements.

The following condition is taken from a Consent Order dated 9/28/98 (as amended on 4/28/00):

1. Visible emissions from the Zone 1 and Zone 2 Dryer stacks shall not exceed 50 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity.
   (Condition E.1 of 9/28/98 Consent Order, as amended on 4/28/00)

The following Condition is taken from Rule 4-4 (Emission Standards for General Process Operations). VOC is not limited because the facility lies outside the Richmond VOC control area (formerly the Richmond nonattainment area for VOC):

2. Emissions from the operation of each of the Dryer (Zones 1 and 2) stacks shall not exceed the limits specified below:

Particulate Matter	22.6 lbs/hr	(9 VAC 5-40-260A)
PM-10	22.6 lbs/hr	(9 VAC 5-40-260A)

Monitoring

Condition 1 was added to the Title V permit for periodic monitoring demonstrations:

1. The Zone 1 and Zone 2 dryer stacks shall be observed visually at least once each calendar week to determine if visible emissions, excluding condensed water vapor/steam, are normal. Each unit observed having apparent abnormal visible emissions shall be followed up with a 40 CFR Appendix A Method 9 visible emissions evaluation unless the apparent abnormal condition is corrected as expeditiously as possible and recorded, and the apparent abnormal condition, its cause, and the corrective action measures taken are recorded. When conditions prevent taking opacity readings using 40 CFR 60 Appendix A Method 9, the permittee shall note the cause(s), such as: inclement weather conditions, steam plume interference, plume intermingling, and sun angle exceedance, and shall perform the Method 9 evaluation as soon as conditions permit.
   (9 VAC 5-80-110 E)

Conditions 2 and 3 were taken from the 9/28/98 Consent Agreement (as amended on 4/28/00):

2. In addition to the visual observations required by Condition V.B.1, the permittee shall conduct quarterly visible emissions evaluations on Zone 1 and Zone 2 Dryer Stacks using 40 CFR 60, Appendix A Method 9, when valid Reference Method 9 parameters can be obtained. Records of these visible emissions evaluations shall be maintained on site and made available for inspection or submitted to DEQ upon request.
   (Condition E.2 of 9/28/98 Consent Order, as amended 4/28/00)

3. The permittee shall perform Method 5 and Method 202 stack tests on Zone 1 and Zone 2 Dryer stacks once every two years. If two consecutive tests show that the particulate emissions are

acceptable, the interval between tests may be lengthened subject to approval by the Director, Piedmont Region.
(Condition E.3 of 9/28/98 Consent Order, as amended 4/28/00)

Recordkeeping

The following record keeping requirements are for the purposes of periodic monitoring (9 VAC 5-80-110):

- Required to keep records of differential pressure readings across the gas scrubber, and scrubber maintenance records
- Required to keep records of throughput and emission data.
- Required to keep records of visible emissions observations, and any subsequent Method 9 visible emission evaluations, the cause of any abnormal and excess visible emissions, corrective measures taken to correct the excess visible emissions, and records of conditions which prevent Method 9 visible emission evaluations in the event of an apparently abnormal visible emission condition.
- Required to keep records of any emissions testing.

Testing

The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

The following condition is from the Commonwealth of Virginia's *Regulations for the Control and Abatement of Air Pollution:*

- The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-50-30, 9 VAC 5-80-110)

- If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM/PM10	EPA Method 5
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

Reporting

To support the periodic monitoring requirements (9 VAC 5-80-110 B) of the TV permit, the following conditions regarding reporting will be placed in the TV permit.

- Report throughput and emissions (calendar year)

- Report the results of any Method 9 visible emissions evaluations

- Report the results of any stack test performed in accordance with Condition V.B.3 within 45 days of the test. The following language was added at the request of the source:

If two consecutive tests show that the particulate emissions are acceptable, the interval between tests may be lengthened subject to approval by the Director, Piedmont Region.

EMISSION UNIT APPLICABLE REQUIREMENTS – (Trim saws, EU ID#E-TS-1)

Limitations

The trim saws do not have any permit-related applicable requirements. The only requirements placed upon the process by the Title V permit are the existing source visible emissions limits, and the grain loading requirements of Rule 4-17: Emission Standards for Woodworking Operations. The installation of the trim saws was determined to be exempt from permit requirements.

1. Visible emissions from the trim saws/Ducon dust collector (EU ID#E-TS-1 and E-PL-39) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity.
(9 VAC 5-40-80 and 9 VAC 5-80-110)

2. Emissions from the operation of the trim saws (EU ID #E-TS-1) shall not exceed the limits specified below:

Total Suspended Particulate	.05 gr/dscf	(9 VAC 5-40-2270)
PM-10	.05 gr/dscf	(9 VAC 5-40-2270)

(9 VAC 5-40-2270 and 5-80-110)

Periodic Monitoring

Monitoring to be added for TV periodic monitoring demonstration (9 VAC 5-80-110 B) as follows:

- Weekly visual observation of the trim saws/Ducon dust collector (EU ID #E-TS-1), with Method 9 follow-up when apparent abnormal condition is noted.

Recordkeeping

The following record keeping requirements are for the purposes of periodic monitoring (9 VAC 5-80-110):

- Required to keep records of throughput
- Required to keep records of any visible emissions evaluations

Testing

The permit does not require source tests for the chip process. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

The following condition is from the Commonwealth of Virginia's *Regulations for the Control and Abatement of Air Pollution:*

- The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-50-30, 9 VAC 5-80-110)

- If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM/PM10	EPA Method 5
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

Reporting

To support the periodic monitoring requirements (9 VAC 5-80-110 B) of the TV permit, the following conditions regarding reporting will be placed in the TV permit.

- Report throughput and emissions (calendar year)
- Report the results of any Method 9 visible emissions evaluations

STREAMLINED REQUIREMENTS

The process weight rule (Rule 4-4: Emission Standards for General Process Operations) could be applicable to the trim saws, but would allow excessive emissions. The .05 gr/scf standard contained in the woodworking rule (Rule 4-17) is more stringent.

EMISSION UNIT APPLICABLE REQUIREMENTS - Paint Spray Booth, EU ID# EP-16)

Limitations

The following limitations for the Paint Spray Booth originate from the 7/22/94 permit except that the "paper" filters originally specified in Condition 1 of the 1994 permit have been changed to "appropriate" filters, since the facility no longer uses paper filters. This does not increase the emissions of the spray booth.

1. Particulate emissions from the spray booth shall be controlled by appropriate filters and operational techniques to minimize over spray. The spray booth shall be provided with adequate access for inspection. The filter shall be equipped with a device to measure the differential pressure drop across the filter during periods of operation. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.
   (9 VAC 5-80-110, and Condition 2 of the 7/22/94 Permit)

2. Volatile Organic Compound emissions from the spray booth shall be minimized by using low VOC coatings containing no more than .005 lb VOC/gal, as applied.
   (9 VAC 5-80-110, and Condition 5 of the 7/22/94 Permit)

3. The spray booth shall consume no more than 200,000 gallons of coating per year, calculated as the sum of each consecutive 12-month period.
   (9 VAC 5-80-110, and Condition 6 of the 7/22/94 Permit)

4. Visible emissions from the spray booth shall not exceed five (5) percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A)
   (9 VAC 5-50-80, 9 VAC 5-80-110, and Condition 9 of the 7/22/94 Permit)

5. Emissions from the operation of the spray booth shall not exceed the limits specified below:

Total Suspended Particulate	6.0 lbs/hr	6.0 tons/yr	(9 VAC 5-50-260)
PM-10	6.0 lbs/hr	6.0 tons/yr	(9 VAC 5-50-260)
Volatile Organic Compounds	0.3 lbs/hr	0.5 tons/yr	(9 VAC 5-50-260)

   (9 VAC 5-80-110 and Condition 9 of the 7/22/94 Permit)

Monitoring

Condition VII.B.1 was taken from the 7/22/94 permit, except the word "paper" (filter) was deleted in favor of the following, since the facility no longer uses paper filters:

1. The permittee shall perform weekly checks of the filters and maintain records of results and any repairs or replacements.
   (9 VAC 5-80-10 H and Condition 2 of 7/22/94 Permit)

The following condition was added to the Title V permit for periodic monitoring demonstrations:

2. The spray booth emissions shall be observed visually at least once each calendar week (when the paint spray booth is in operation) for at least a brief time period to determine whether the visible

emissions are normal. If the spray booth is observed having apparent abnormal visible emissions shall be followed up with a 40 CFR Appendix A Method 9 visible emissions evaluation unless the apparent abnormal condition is corrected as expeditiously as possible and recorded, and the apparent abnormal condition, its cause, and the corrective action measures taken are recorded. When conditions prevent taking opacity readings using 40 CFR 60 Appendix A Method 9, the permittee shall note the cause(s), such as: inclement weather conditions, steam plume interference, plume intermingling, and sun angle exceedance, and shall perform the Method 9 evaluation as soon as conditions permit.
(9 VAC 5-50-20)

Recordkeeping

The following record keeping requirements are for the purposes of periodic monitoring (9 VAC 5-80-110):

- Required to keep records of filter repair and replacement
- Required to keep records of throughput and emission data.
- Required to keep records of visible emissions observations.

Testing

The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

The following condition is from the Commonwealth of Virginia's *Regulations for the Control and Abatement of Air Pollution:*

- The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
  (9 VAC 5-50-30, 9 VAC 5-80-110)

- If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Methods 18, 25, 25a
PM/PM10	EPA Method 5
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

Reporting

To support the periodic monitoring requirements (9 VAC 5-80-110 B) of the TV permit, the following conditions regarding reporting will be placed in the TV permit.

- Report the results of any Method 9 visible emissions evaluations

EMISSION UNIT APPLICABLE REQUIREMENTS – Hot Roll Coating Operation, EU ID #HR-1)

Limitations

The following limitations for the Hot Roll Coating Operation originate from the 2/10/04 permit:

1. Volatile organic compounds shall not be intentionally spilled, discarded to sewers, stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution control practices for minimizing emissions.
(9 VAC 5-80-110, and Condition 3 of the 8/14/03 Permit)

2. The production of softboard panels using prepress sealer shall not exceed 73.60 MMSF per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 4 of 8/14/03 Permit)

3. Emissions from the operation of the hot roll coating operation shall not exceed the limits specified below:

Volatile Organic Compounds	4.24 lbs/hr	18.62 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition number VII.A.2.
(9 VAC 5-80-110 and Condition 5 of the 02/10/04 Permit)

4. Organic Hazardous Air Pollutant emissions from the operation of the hot roll coating operation shall not exceed 0.48 lb HAP/gallon. When the compliant material compliance option is used, thinners and cleaning materials shall contain no organic HAP.
(9 VAC 5-80-110 and Condition 6 of the 02/10/04 Permit)

5. Except where this permit is more restrictive, the hot roll coating operation shall be operated in compliance with the requirements of 40 CFR 63, Subpart QQQQ.
(9 VAC 5-80-110 and Condition 7 of the 02/10/04 Permit)

6. The facility shall be subject to the General Provisions (Subpart A) of 40 CFR 63 as outlined in the table below:

Table 1 to Subpart QQQQ of 40 CFR 63:
General Provisions Applicability to Subpart QQQQ

Reference	Subject	Applies to Subpart QQQQ	Comment
63.1(a)(1)-(a)(14)	General Applicability	Yes.	
63.1(b)(1)-(3)	Initial Applicability Determination	Yes.	Applicability to Subpart QQQQ is also in § 63.4681.
63.1(c)(1)	Applicability After Standard Established	Yes.	
63.1(c)(2)-(3)	Applicability of Permit Program for Area Sources	No.	Area sources are not subject to Subpart QQQQ.
63.1(c)(4)-(5)	Extensions and Notifications	Yes.	
63.1(e)	Applicability of Permit Program Before Relevant Standard is Set	Yes.	

Reference	Subject	Applies to Subpart QQQQ	Comment
63.2	Definitions	Yes.	Additional definitions are specified in § 63.4781.
63.3(a)-(c)	Units and Abbreviations	Yes.	
63.4(a)(1)-(5)	Prohibited Activities	Yes.	
63.4(b)-(c)	Circumvention/ Severability	Yes.	
63.5(a)	Construction/ Reconstruction	Yes.	
63.5(b)(1)-(6)	Requirements for Existing,Newly Constructed, and Reconstructed Sources	Yes.	
63.5(d)	Application for Approval of Construction/ Reconstruction	Yes.	
63.5(e)	Approval of Construction/ Reconstruction	Yes.	
63.5(f)	Approval of Construction/ Reconstruction Based on Prior State Review	Yes.	
63.6(a)	Compliance with Standards and Maintenance Requirements	Yes.	
63.6(b)(1)-(7)	Compliance Dates for New and Reconstructed Sources	Yes.	§ 63.4683 specifies the compliance dates
63.6(c)(1)-(5)	Compliance Dates for Existing Sources	Yes.	§ 63.4683 specifies the compliance dates
63.6(e)(1)-(2)	Operation and Maintenance	No	Section reserved.
63.6(e)(3)	SSMP	Yes.	Only sources using an add-on control device to comply with the standard must complete SSMP.
63.6(f)(1)	Compliance Except During SSM	Yes.	Applies only to sources using add-on control device to comply.
63.6(f)(2)-(3)	Methods for Determining Compliance	Yes.	
63.6(g)(1)-(3)	Use of an Alternative Standard	Yes.	Subpart KK does not require COMS.
63.6(h)	Compliance with Opacity/Visible Emission Standards	No.	Subpart QQQQ does not establish opacity standards and does not require continuous opacity monitoring systems (COMS).
63.6(i)(1)-(16)	Extension of Compliance	Yes.	
63.6(j)	Presidential Compliance Exemption	Yes.	
63.7(a)(1)	Performance Test Requirements	Yes.	Applies to all affected sources. Additional requirements for performance testing specified in §§ 63.4764, 63.4765, and 63.4766.
63.7(a)(2)	Performance Test Requirements-Dates	Yes.	Applies only to performance tests for capture system and control device efficiency at sources using these to comply with the standard.
63.7(a)(3)	Performance Tests required by the Administrator	Yes.	
63.7(b)-(e)	Performance Test Requirements	Yes.	Applies only to performance tests for capture system and control device efficiency at sources using these to comply with the standard.
63.7(f)	Use of Alternative Test Methods	Yes.	Applies to all test methods except those used to determine capture system efficiency.
63.7(g)-(h)	Data Analysis,	Yes.	Applies only to performance tests for

Reference	Subject	Applies to Subpart QQQQ	Comment
	Recordkeeping, Reporting, Waiver of Test		capture system and control device efficiency at sources using these to comply with the standard.
63.8(a)(1)-(3)	Monitoring Requirements-Applicability	Yes.	Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional standards for monitoring are specified in § 63.4768.
63.8(a)(4)	Additional Monitoring Requirements	No.	Subpart QQQQ does not require COMS
63.8(b)	Conduct of Monitoring	Yes.	Provisions for COMS are not applicable.
63.8(c)(1)-(3)	CMS Operation and Maintenance	Yes.	Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional standards for monitoring are specified in § 63.4768.
63.8(c)(4)	CMSs	No.	§ 63.4768 specifies the requirements for the operation of CMS for capture systems and add-on control devices at sources using these to comply.
63.8(c)(5)	COMS	No.	Subpart QQQQ does not have opacity for visible emission standards.
63.8(c)(6)	CMS Requirements	No.	§ 63.4768 specifies the requirements for the operation of CMS for capture systems and add-on control devices at sources using these to comply.
63.8(c)(7)	CMS Out-of-Control periods	Yes.	Initial notification submission date extended.
63.8(c)(8)	CMS Out-of-Control Periods Reporting	No.	§ 63.4720 requires reporting of CMS out-of-control periods.
63.8(d)-(e)	Quality Control Program	No..	Subpart QQQQ does not require the use of continuous emissions monitoring systems.
63.8(f)(1)-(5)	Use of an Alternative Monitoring Method	Yes.	
63.8(f)(6)	Alternative to Relative Accuracy Test	No.	Subpart QQQQ does not require the use of continuous emissions monitoring systems.
63.8(g)(1)-(5)	Data Reduction	No.	§§ 63.4767 and 63.4768 specify monitoring data reduction.
63.9(a)-(d)	Notification Req'mts	Yes.	
63.9(e)	Notification of Performance Test	Yes.	Applies only to capture system and add-on control device performance tests at sources using these to comply with the standard.
63.9(f)	Notification of VE/Opacity Test	No.	Subpart QQQQ does not have opacity or visible emission standards.
63.9(g)(1)-(3)	Add'l Notification When Using CMS	No.	Subpart QQQQ does not require the use of continuous emissions monitoring systems.
63.9(h)	Notification of Compliance Status	Yes.	§ 63.4710 specifies the dates for submitting the notification of compliance status.
63.9(i)	Adjustment of Submittal Deadlines	Yes.	
63.9(j)	Change in Previous Information	Yes.	
63.10(a)	Recordkeeping/ Reporting	Yes.	
63.10(b)(1)	General Recordkeeping	Yes.	Additional requirements are specified in §§ 63.4730 and 63.4731.
63.10(b)(2)(i)-(v)	Recordkeeping relevant to SSM	Yes.	Requirements for SSM records only apply to add-on control devices used to comply with the standard.
63.10(b)(2)(vi)-(xi)		Yes.	

Reference	Subject	Applies to Subpart QQQQ	Comment
63.10(b)(2)(xii)	Records	Yes.	
63.10(b)(2)(xiii)		No.	Subpart QQQQ does not require opacity and visible emissions evaluations.
63.10(b)(2)(xiv)		Yes.	
63.10(b)(3)	Recordkeeping requirements	Yes.	
63.10(c)(1)-(6)	Add'l Recordkeeping Req'mts for Sources with CMS	Yes.	
63.10(c)(7)-(8)		No.	The same records are required in § 63.4720(a)(7).
63.10(c)(9)-(15)		Yes.	
63.10(d)(1)	General Reporting Requirements	Yes.	Additional requirements are specified in § 63.4720.
63.10(d)(2)	Report of Performance Test Results	Yes.	Additional requirements are specified in § 63.4720(b).
63.10(d)(3)	Reporting VE Observations	No.	Subpart QQQQ does not require opacity or visible emissions observations.
63.10(d)(4)	Progress Reports for Sources with Compliance Extensions	Yes.	
63.10(d)(5)	SSM Reports	Yes.	Applies only to add-on control devices at sources using these to comply with the standard.
63.10(e)(1)-(2)	Additional CMS Reports	No.	Subpart QQQQ does not require the use of continuous emissions monitoring systems.
63.10(e)(3)	Excess Emission Reports	No.	§ 63.4720 (b) specifies the contents of periodic compliance reports.
63.10(e)(4)	COMS Data Reports	No.	Subpart QQQQ does not specify requirements for opacity or COMS.
63.10(f)	Recordkeeping/ Reporting Waiver	Yes.	
63.11	Control Device Requirements/Flares	No.	Subpart QQQQ does not specify the use of flares for compliance.
63.12	State Authority and Delegations	Yes.	
63.13	Addresses	Yes.	
63.14	Incorporation by Reference	Yes.	Test Methods ANSI/ASME PTC 19.10-1981, ASTM D2697-86 (Reapproved 1998), ASTM D6093-97 (incorporated by reference, see § 63.14).
63.15	Availability of Information	Yes.	

(9 VAC 5-60-90)

Monitoring

1. The initial compliance period begins on the date of startup and ends on the last day of the 12th month following startup. If startup occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months.
(9 VAC 5-80-110 and Condition 8 of the 02/10/04 Permit)

2. The permittee must use either the compliant material option or the emission rate without add-on controls option for the hot roll coating operation. For the compliant material option, the initial compliance demonstration includes the calculations according to 40 CFR 63.4741 and supporting documentation showing that during the initial compliance period, no coating was used with an organic HAP content that exceeded the emission limit contained in Condition VII.A.4, and that no thinners or cleaning materials were used that contained organic HAP. For the emission rate without add-on controls option, the permittee shall determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate a 12-month organic HAP emission rate at the end

of the initial 12-month compliance period. The initial compliance demonstration includes the calculations according to 40 CFR 63.4751 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the emission limit contained in Condition VII.A.4.
(9 VAC 5-80-110 and Condition 9 of the 02/10/04 Permit)

3. To demonstrate continuous compliance (with the compliant material option), the permittee shall use no coating for which the organic HAP content determined using Equation 2 of 40 CFR 63.4741exceeds the emission limit contained in Condtion VII.A.4.

$$H_c = \frac{(D_c)(W_c)}{V_s} \qquad \text{(Eq. 2)}$$

where:

H_c = Organic HAP content of the coating, grams organic HAP per liter coating solids
D_c = Density of coating, grams coating per liter coating, determined according to test results using ASTM Method D1475-90 or information from the supplier or manufacturer of the material. If there is disagreement between ASTM Method D1475-90 test results and the supplier's or manufacturer's information, the test results will take precedence.
W_c= Mass fraction of organic HAP in the coating, grams organic HAP per gram coating, determined according to 40 CFR 63.4741(a).
V_s= Volume fraction of coating solids, liter coating solids per liter coating, determined according to 40 CFR 63. 4741(b).

A compliance period consists of 12 months. Each month after the end of the initial compliance period described in Condition VII.B.1 is the end of a compliance period consisting of that month and the preceding 11 months.
(9 VAC 5-80-110 and Condition 10 of the 02/10/04 Permit)

4. To demonstrate continuous compliance (with the emission rate without add-on controls option), the organic HAP emission rate for each compliance period, calculated using Equation 3 of 40 CFR 63.4751, must be less than or equal to the emission limit contained in Condition VII.A.4. A compliance period consists of 12 months. Each month after then end of the initial compliance period described in Condition VII.B.1 is the end of a compliance period consisting of that month and the preceding 11 months.
(9 VAC 5-80-110 and Condition 11 of the 02/10/04 Permit)

Recordkeeping

- Annual production in square feet of softboard panels processed by the hot roll coating operation calculated monthly as the sum of each consecutive 12-month period.

- Monthly and annual emissions in pounds of HAP. Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.

The source is required to keep records showing continuous compliance with 40 CFR 63 Subpart QQQQ:

- A copy of each notification and report submitted in compliance with 40 CFR 63 Subpart QQQQ.

- A current copy of information provided by materials suppliers or manufacturers, including but not limited to the manufacturer's formulation data, or test data used to determine the mass fraction of

organic HAP and density for each coating, thinner, and cleaning material and the volume fraction of coating solids for each coating. If the permittee conducts testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, then a copy of the complete test report is required. If information is provided by the manufacturer or supplier, the permittee may keep only the summary sheet of results provided by the manufacturer or supplier. In that case, the permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

- For each compliance period, the permittee shall keep the following records:

  1. A record of the coating operations at which each compliance option was used and the time periods (beginning and ending dates and times) that each option was used.

  2. For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.4741.

  3. For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners, and cleaning materials used each month, using Equations 1, 1A through C, and 2 of 40 CFR 63.4751; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.4751(e)(4); the calculation of the total volume of coating solids used each month, using Equation 2 of 40 CFR 63.4751; and the calculation of each 12-month organic HAP emission rate, using Equation 3 of 63.4751.

- A record of the name and volume of each coating, thinner, and cleaning material used during each compliance period.

- A record of the mass fraction of organic HAP for each coating, thinner, and cleaning material used during each compliance period.

- A record of the volume fraction of coating solids for each coating used during each compliance period.

- A record of the density for each coating used during the compliance period; and, if the emission rate without add-on control option is used, the density for each thinner and cleaning material used during each compliance period.

- If an allowance is used in Equation 1 of 40 CFR 63.4751 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.4751(e)(4), the following records must be kept:

  1. The name and address of each TSDF to which waste materials for which an allowance was taken were sent; a statement of which subparts under 40 CFR parts 262, 264, 265 and 266 apply to the facility; and the date of each shipment.

  2. Identification of the coating operations producing waste materials included in each shipment and the month or months in which the allowance was taken for these materials in Equation 1 of 40 CFR 63.4751.

  3. The methodology used in accordance with 40 CFR 63.4751(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and

supporting calculations and documentation, including the waste manifest for each shipment.

- Records of the date, time, and duration of each deviation from the standard contained in Condition VIII.A.4.

Testing

The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

The following condition is from the Commonwealth of Virginia's *Regulations for the Control and Abatement of Air Pollution:*

- The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
  (9 VAC 5-50-30, 9 VAC 5-80-110)

Reporting

To support the periodic monitoring requirements (9 VAC 5-80-110 B) of the TV permit, the following conditions regarding reporting will be placed in the TV permit. The following condition was placed in the new source permit prior to the issuance of the Title V permit. This condition will satisfy Title V reporting requirements.

Semiannual compliance reporting

- The permittee shall submit semiannual compliance reports for the hot roll coating operation according to the following requirements. The semiannual compliance reporting requirements may be satisfied by reports required under 40 CFR Part 70 when the facility obtains a Title V permit, as specified in Condition VIII.E.1.b.

  a. Unless otherwise approved by the Director, Piedmont Region, the permittee shall prepare and submit each semiannual compliance report according to the dates specified in Condition VIII.E.1.a(1)-(4):

     1. The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in Condition VII.B.8 that applies to the hot roll coating operation and ends on June 30 or December 1, whichever occurs first following the end of the initial compliance period.

     2. Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 to December 31.

     3. Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

  b. Each facility that has obtained a title V operating permit pursuant to 40 CFR part 70 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A). If a facility submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission shall be

deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the facility may have to report deviations from permit requirements to DEQ.

c. The semiannual compliance report must contain the information specified in VIII.E.1.c(1)-(5), and the information that is specified in VIII.E.1.d-f that is applicable for the compliance period.

   1. Company name and address.

   2. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

   3. Date of the report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

   4. Identification of the compliance option or options used during the reporting period. If the permittee switched between compliance options during the reporting period, the report must include the beginning and ending dates that each option was used.

   5. If the emission rate without add-on controls option was used, the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.

d. **No deviations.** If there were no deviations from the emission limitations in Condition VIII.A.4, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period.

e. **Deviations: compliant material option.** If the compliant material option was used, and there was a deviation from the emission limit contained in Condition VIII.A.4, the semiannual compliance report must contain the following information:

   1. Identification of each coating used that deviated from the emission limit, each thinner or cleaning material used that contained organic HAP, and the dates and time periods each was used.

   2. The calculation of the organic HAP content (using Equation 2 of 40 CFR 63.4741) for each coating identified in Condition VIII.E.1.e (1). It is not necessary to submit background data supporting this calculation (*e.g.,* information provided by coating suppliers or manufacturers, or test reports).

   3. The determination of mass fraction of organic HAP for each coating, thinner, and cleaning material identified in Condition VIII.E.1.e(1). It is not necessary to submit background data supporting this calculation (*e.g.,* information provided by coating suppliers or manufacturers, or test reports).

   4. A statement of the cause of each deviation.

f. **Deviations: emission rate without add-on controls option.** If the emission rate without add-on controls option was used, and there was a deviation from the emission limit contained in Condition VIII.A.4, the semiannual compliance report must contain the following information:

   1. The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the emission limit contained in Condition VIII.A.4.

2. The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, to include the calculations for Equations 1, 1A through 1C, 2, and 3 in 40 CFR 63.4751; and if applicable, the calculation used to determine the mass of organic HAP in waste materials according to 40 CFR 63.4751(e)(4). It is not necessary to submit background data supporting this calculation (*e.g.,* information provided by coating suppliers or manufacturers, or test reports).

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions, including those caused by upsets, within one business day.

FUTURE APPLICABLE REQUIREMENTS

The facility will be subject to 40 CFR 63 Subpart DDDD, the Plywood and Composite Wood Products MACT.

COMPLIANCE PLAN

Currently no compliance plan has been submitted by the permittee. This situation may change pending review of recent compliance tests conducted by the facility.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, record keeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation (9 VAC ___	Pollutant(s) Emitted (5-80-720 B)	Rated Capacity (5-80-720 C)
F-CP-2	Vibrating Screen	5-80-720 B	TSP/PM-10	120 tons/hr
F-CP-3A	Accepts Conveyor	5-80-720 B	TSP/PM-10	120 tons/hr
F-CP-3B	Transfer Conveyor	5-80-720 B	TSP/PM-10	120 tons/hr
F-CP-5	NW Wood Chip Pile	5-80-720 B	TSP/PM-10	60 tons/hr
F-CP-6	NC Wood Chip Pile	5-80-720 B	TSP/PM-10	60 tons/hr
F-CP-7	NE Wood Chip Pile	5-80-720 B	TSP/PM-10	60 tons/hr
F-CP-8	SW Wood Chip Pile	5-80-720 B	TSP/PM-10	60 tons/hr
F-CP-9	SC Wood Chip Pile	5-80-720 B	TSP/PM-10	60 tons/hr
F-CP-10	SE Wood Chip Pile	5-80-720 B	TSP/PM-10	60 tons/hr
F-CP-11	Reclaim Hopper	5-80-720 B	TSP/PM-10	60 tons/hr
E-PP-7	Vent, Main Refiner Chest	5-80-720 B	TSP/PM-10 VOC	24 tons/hr
E-PP-8	Vent, #5 Refiner Chest	5-80-720 B	TSP/PM-10 VOC	6 tons/hr

Emission Unit No.	Emission Unit Description	Citation (9 VAC ___	Pollutant(s) Emitted (5-80-720 B)	Rated Capacity (5-80-720 C)
F-PP-12	Broke Tank	5-80-720 B	VOC	186,736 gallons
F-PP-13	White Water Surge Tank	5-80-720 B	VOC	186,736 gallons
E-CP-1	Re-chipper Cyclone	5-80-720 B	TSP/PM-10	6 tons/hr
E-PL-9	Vacuum Tank	5-80-720 B	TSP/PM-10	10,415 scfm
E-PL-10	Wet End Seal Fan Vent	5-80-720 B	TSP/PM-10	6878 scfm
F-AP-14	Asphalt Piles	5-80-720 B	TSP/PM-10	20 tons/hr
F-AP-15	Asphalt Unloading	5-80-720 B	TSP/PM-10	20 tons/hr
F-AP-16	Hammer Mill	5-80-720 B	TSP/PM-10	20 tons/hr

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

CONFIDENTIAL INFORMATION

The facility did not request that any portion of the TV permit be made confidential.

PUBLIC PARTICIPATION

The public notice was placed in the Richmond Times-Dispatch on March 14, 2004. The public notice was placed in the Richmond Times-Dispatch on March 14, 2004. Two parties made comments during the 30 day public notice period, one being the permittee. Response to the comments from Georgia-Pacific regarding Permit Condition III.A.6 are included in this Statement of Basis document. Additionally, changes were made to the Title V permit, including: correction of the area code for facility contacts, and incorporation of the proposed changes to Conditions III.A.6, III.B.4, and III.C.1.c and d.

The other comments were general in nature, asking if Georgia Pacific would be required to install controls. A response was e-mailed to the commenter but did not affect the permit.

The proposed permit was sent to EPA on June 11, 2004 and no comments were received.